

Facility Name: **Scientific Games International, Inc.**

City: Alpharetta

County: Forsyth

AIRS #: 04-13-117-00025

Application #: TV-22394

Date Application Received: January 23, 2014

Permit No: 2754-117-0025-V-05-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to **Scientific Games International, Inc.** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification**

1. Facility Name: Scientific Games International, Inc.
2. Parent/Holding Company Name: Scientific Games Holding Corp.
3. Previous and/or Other Name(s): None
4. Facility Location

1500 Bluegrass Lakes Parkway
Alpharetta, GA 30004
Forsyth County
5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in a non-attainment area for ozone.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
2754-117-0025-V-04-0	7/23/2009	Initial Title V permit
2754-117-0025-V-04-1	6/7/2010	Modified to include capture efficiency in the emissions calculations
2754-117-0025-V-04-2	12/21/2010	Removal of press P1 and the parts washer PW
2754-117-0025-V-04-3	-	Revoked in V-04-4; the facility had comments after the construction permit was issued so a new permit had to be issued to incorporate the comments
2754-117-0025-V-04-4	6/28/2013	Construction and operation of press P7

D. Process Description

1. SIC Codes(s)

2754

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The facility manufactures instant lottery tickets.

3. Overall Facility Process Description

Scientific Games is a commercial printing facility in Alpharetta (Forsyth County), which prints instant lottery tickets.

Water based inks are mixed as necessary for use on the printing press units. The facility utilizes flexographic printing units for manufacture of the lottery tickets. Each of the print lines is surrounded by a permanent total enclosure, and the emissions from each line are fed to one of the thermal oxidizers.

After the lottery tickets have been printed, they are gathered in rolls and placed in the adjacent packaging area. The sheets of lottery tickets are then folded and separated as necessary for shipping.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

The facility is a major source of VOC emissions in regard to PSD/ NAA-NSR because VOC potential emissions are greater than 25 tons per year. The facility is located in an ozone non-attainment area and therefore subject to NAA-NSR.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	Y			X
PM ₁₀	Y			X
PM _{2.5}	Y			X
SO ₂	Y			X
VOC	Y	X		
NO _x	Y			X
CO	Y			X
TRS	N			-
H ₂ S	N			-
Individual HAP	Y		X	
Total HAPs	Y		X	
Total GHGs	Y			X

3. MACT Standards

The facility is not subject to any major-source MACT standards since the HAP emissions are limited to below major source applicability thresholds.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	N
Program Code 8 – Part 61 NESHAP	N
Program Code 9 - NSPS	N
Program Code M – Part 63 NESHAP	N
Program Code V – Title V	Y

Regulatory Analysis**II. Facility Wide Requirements****A. Emission and Operating Caps:**

There are facility wide HAP emission limits of less than 10 tons per year of any single HAP and/or less than 25 tons per year of any combination of HAPs. These HAP emissions limits prevent the facility from being subject to federal regulations listed under 40 CFR 63 for major sources of regulated HAPs.

B. Applicable Rules and Regulations

None applicable.

C. Compliance Status

The facility did not indicate any compliance issues in the application

D. Operational Flexibility

None applicable.

E. Permit Conditions

Condition 2.1.1 states the HAP emissions limits of 10 tons per year of any single HAP and/or 25 tons per year of any combination of HAPs. This limits the HAP emissions to less than the major source threshold for major source MACT regulations.

III. Regulated Equipment Requirements

A. Brief Process Description

Scientific Games is a commercial printing facility in Alpharetta (Forsyth County), which prints instant lottery tickets.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements / Standards*	Corresponding Permit Conditions	ID No.	Description
P3	Flexographic Press with 21 Flexographic Print Units and UV Cure Dryer	391-3-1-.02(2)(mm) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.2.1a, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 5.2.1, 5.2.2, 5.2.3, 6.1.7, 6.1.8, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.11, 6.2.12, 6.2.13	O3	Regenerative Thermal Oxidizer
P4	In-Line Flexographic Press with 19 Flexographic Print Units	391-3-1-.02(2)(mm) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.2.1b, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 5.2.1, 5.2.2, 5.2.5, 6.1.7, 6.1.8, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.7, 6.2.8, 6.2.11, 6.2.12, 6.2.13	O4	Regenerative Thermal Oxidizer
P6	Flexographic Press with 19 Flexographic Print Units	391-3-1-.02(2)(mm) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.2.1c, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 5.2.1, 5.2.2, 5.2.5, 6.1.7, 6.1.8, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13	O4	Regenerative Thermal Oxidizer
P7	Flexographic Press with 20 Printing Units	391-3-1-.02(2)(mm) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.2.1d, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 5.2.1, 5.2.2, 5.2.4, 6.1.7, 6.1.8, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.11, 6.2.12, 6.2.13, 6.2.14, 6.2.15	O3	Regenerative Thermal Oxidizer

C. Equipment & Rule Applicability

Emission and Operating Caps:

The facility has removed some equipment and transitioned to water-based inks and UV-cured inks, solvent based inks are no longer used. This has changed the equipment included in the emission caps as some are no longer significant sources of VOC emissions.

The facility was initially permitted as a Title V facility on November 6, 2000, via Permit No. 2754-117-0025-V-01-0. The initial Title V Permit included three NAA-NSR avoidance limits which were a 80 tpy VOC limit for Emission Units P1, IMA1, PW, and ST1 – ST6; a 25 tpy VOC limit for Emission Units P2, IMA2, PR, and ST8; and a 14 tpy VOC limit for Emission Units P3 and ST7. In Amendment 2754-117-0025-V-01-2, issued July 13, 2004, an additional NAA-NSR avoidance limit was added for the new press that was constructed with this permit amendment; a 10 tpy VOC limit for Emission Unit P4.

The newest press, Press P6, was constructed under Synthetic Minor Permit No. 2754-117-0025-S-03-0 and at that time, operated under the 25 tpy facility-wide VOC limit. However, the facility is a major source in regard to NAA-NSR, and the emissions from this modification, Press P6, must be evaluated under these regulations. Since, at the time of permitting, this unit had existed for less than 2 years, it qualified as a new unit as defined in 40 CFR 51.165(a)(1)(vii)(A). As a new unit, to determine if the addition of the press would qualify as a major modification under NAA-NSR, only the potential emissions from the press were considered (since past actual emissions equal zero). The net emissions over the last five years included a 10 tpy VOC emission increase from Press P4 in 2004. Therefore to limit Press P6 to avoid NAA-NSR review, the net emission changes aggregated over the past 5 years must also be less than 25tpy. Including the emissions from Press P4 in the net emissions, Press P6 was limited to less than 15 tpy of VOC emissions to avoid NAA-NSR review.

In this application, TV-22394, the facility stated that press P2 has been removed from the facility. This leaves only flexographic presses at the facility. Also, IMA2, the ink mixing area for Press P2, is no longer a significant emission unit as the facility does not use solvent based inks, there is no need for a ink mixing area that would be vented to the oxidizer. Also tanks ST1 – ST5 have been emptied, cleaned and the piping removed. Tanks ST6-ST8 are now used for the storage of water-based ink waste. The capacity of each of these tanks is 3,000 gallons and the VOC emissions from them are estimated to be less than 1 tpy of VOC; they are an insignificant source of emissions.

With these changes, the emission limits are now as follows: 14 tpy of VOC for Press P3; 10 tpy of VOC for Press P4; 15.0 tpy for Press P6; and 25 tpy of VOC for P7. These changes are reflected in Condition 3.2.1

Rules and Regulations Assessment:

40 CFR 60 Subpart QQ “Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing”

This rule is not applicable to the publication rotogravure printing presses at Scientific Games in spite of their construction after October 28, 1980. The definition of “publication rotogravure printing press” in 40 CFR 60.431 does not include the printing of lottery tickets/games of chance in any of the specified categories of the salable paper products.

Georgia Rule 391-3-1-.02(2)(b), “Visible Emissions”

This rule limits the opacity from the facility to less than 40%.

Georgia Rule 391-3-1-.02(2)(e), “Particulate Emissions from Manufacturing Process”

This limits the particulate emissions from the facility.

Georgia Rule 391-3-1-.02(2)(mm) – “VOC Emissions from the Graphic Arts Systems”

This rule applies to all presses at the facility, Presses P3, P4, P6, and P7. The facility can comply with the limits for publication flexographic printing stated in this rule by using low VOC content inks; daily weighted averaging per single line; or operating the thermal oxidizers to achieve at least 90 percent reduction efficiency. Thermal oxidizer O3, which services presses P3 and P7, has a destruction efficiency of approximately 98 percent, as noted in the most recent performance test, and therefore these presses can comply by use of the thermal oxidizer. However, the facility has the option as provided in the Rule for the use low VOC content inks. Thermal oxidizer O4 that services presses P4 and P6 only achieves approximately 80% destruction efficiency, as noted in most recent performance test. Presses P4 and P6 can comply with the Rule by the use low VOC content inks.

Due to removal of equipment and/or the transition to water-based inks reducing VOC emissions, the facility is no longer subject to the following rules:

Georgia Rule 391-3-1-.02(2)(ff) – “Solvent Metal Cleaning”

This is no longer applicable since this equipment is no longer used in this manner.

Georgia Rule 391-3-1-.02(2)(tt) – “VOC Emissions from Major Sources”

This is no longer applicable as there are no other major sources of VOC emissions at the facility other than the printing presses which are subject to Rule (mm)

Georgia Rule 391-3-1-.02(2)(vv) – “Volatile Organic Liquid Handling and Storage”

This is no longer applicable as the tanks that are still in service have a capacity of less than 4,000 gallons and the VOC emissions are negligible, as it is water-based ink waste.

Georgia Rule 391-3-1-.02(2)(ccc) – “VOC Emissions from Bulk Mixing Tanks”

This is no longer applicable as the inks used at the facility are not a significant source of VOC emissions and these tanks are no longer in service for this operation.

Georgia Rule 391-3-1-.02(2)(ddd) – “VOC Emissions from Offset Lithography”

This is no longer applicable as there are no lithographic presses at the facility.

D. Compliance Status

The facility did not indicate any compliance issues in the application.

E. Operational Flexibility

None applicable.

F. Permit Conditions

Condition 3.2.1 states the VOC emission limits for the individual presses at the facility. This is discussed at length above in the “Emission and Operating Caps” section.

Conditions 3.4.1 – 3.4.2 state the requirements of Georgia Rule (mm).

Condition 3.4.3 states the requirements of Georgia Rule (b).

Condition 3.4.4 states the requirements of Georgia Rule (e).

Several conditions have been deleted and therefor the above conditions were renumbered accordingly in this permit, Permit No. 2754-117-0025-V-05-0.

Previous Conditions 3.4.1 and 3.4.2 referred to Georgia Rule (ddd) which is no longer applicable so these conditions have been deleted.

Previous Condition 3.4.3 referred to Georgia Rule (ccc) which is no longer applicable so this condition has been deleted.

Previous Condition 3.4.4 referred to Georgia Rule (ff) which is no longer applicable so this condition has been deleted. The Parts Washer was removed from service, as it was used with the rotogravure press, and the permit in Permit Amendment No. 2754-117-0025-V-04-2; the condition was deleted at that time.

Previous Condition 3.4.5 referred to Georgia Rule (vv) which is no longer applicable so this condition has been deleted.

Previous Condition 3.4.7 referred to the section of Georgia Rule (mm) that was applicable to rotogravure printing. This press was removed from the facility and the permit in Permit Amendment No. 2754-117-0025-V-04-2, and the condition was deleted at that time.

Previous Condition 3.4.11 and 3.4.12 referred to Georgia Rule (w) which is no longer applicable so these conditions have been deleted. This rule is for rotogravure presses, and the rotogravure press was removed from the facility and the permit in Permit Amendment No. 2754-117-0025-V-04-2, and the condition was deleted at that time.

No changes have been made to the Conditions in Section 3.5.

IV. Testing Requirements (with Associated Record Keeping and Reporting)**A. General Testing Requirements**

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements**1. Individual Equipment**

Condition 4.2.1 has been added in the permit, Permit No. 2754-117-0025-V-05-0, requiring the facility to perform performance tests on the thermal oxidizers, O3 and O4, at a maximum of 61 months. This will ensure that the oxidizers are continuing to have the destruction efficiency associated with the operating temperature the facility monitors. If the process line is not operating and/or the oxidizer is not operating, the facility can petition to delay the testing.

2. Equipment Groups (all subject to the same test requirements):

None applicable.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

1. Individual Equipment:

Condition 5.2.1 requires the facility to monitor the combustion chamber temperature for the RTOs. The facility must maintain the temperature as determined from the most recent performance test in order to take credit for the destruction efficiency noted during the test. Since the facility no longer uses solvent-based inks, they can meet the compliant coating option of Rule (mm) and do not have to meet the oxidizer requirements for the rule.

Condition 5.2.2 requires the facility to perform inspections to ensure good housekeeping measures that prevent fugitive VOC emissions. These inspections show compliance with Condition 3.5.3

Previous Condition 5.2.3 requiring inspections for the Ink Mixing Areas has been removed for this permit as the Ink Mixing Areas are no longer a significant VOC emission source.

Previous Condition 5.2.4 requiring inspections for the Parts Washer was removed in Permit Amendment No. 2754-117-0025-V-04-2 when the parts washer was removed from the permit.

2. Equipment Groups (all subject to the same monitoring requirements):

None applicable.

C. Compliance Assurance Monitoring (CAM)

Presses P3, P4, P6, and P7 are subject to CAM. These presses use a control device to meet the standards of Rule (mm). Currently the facility could meet these standards using the compliant coatings option, but in order to maintain the flexibility to use the add-on control device compliance option, the facility will remain subject to CAM and the permit conditions required. The facility monitors the combustion temperature to ensure the destruction efficiency noted during the most recent performance test is achieved. Conditions 5.2.3 through 5.2.5 state the CAM requirements for the RTOs.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

Template Conditions 6.1.3 and 6.1.4 were updated in September 2011 to allow ~60 days to submit periodic reports. Alternative reporting deadlines are allowed per 40 CFR 70.6, 40 CFR 60.19(f) and 40 CFR 63.10(a).

B. Specific Record Keeping and Reporting Requirements

Condition 6.1.7 has been modified to remove references to equipment that is no longer a significant source of VOC emissions, and to remove references to rules that are no longer applicable.

Conditions 6.2.1-6.2.3 state the requirements for recordkeeping and monthly and yearly reporting for the facility wide 10/25 HAP emission limit. These conditions have not changed from the previous permit.

Condition 6.2.4 states the recordkeeping for monthly VOC usage. This condition has not changed from the previous permit.

Conditions 6.2.5 and 6.2.6 state the monthly and yearly reporting requirement for the VOC emission limit for Emission Units P3. These requirements were previously conditions 6.2.9 and 6.2.10.

Previous conditions 6.2.5 and 6.2.6 stated the requirements for recordkeeping and monthly and yearly reporting for the VOC emission limit for Emission Units P1, IMA1, PW, and ST 1-6, combine. These conditions have been deleted since the emission units referenced are either no longer at the facility or no longer significant sources of VOC emissions.

Conditions 6.2.7 and 6.2.8 state the monthly and yearly reporting requirement for the VOC emission limit for Emission Unit P4. These requirements were previously conditions 6.2.11 and 6.2.12.

Previous conditions 6.2.7 and 6.2.8 stated the monthly and yearly reporting requirement for the VOC emission limit for Emission Units P2, IMA2, PR, and ST8. These conditions have been deleted since the emission units referenced are either no longer at the facility or no longer significant sources of VOC emissions.

Conditions 6.2.9 and 6.2.10 state the monthly and yearly reporting requirement for the VOC emission limit for Emission Unit P6. These requirements were previously conditions 6.2.13 and 6.2.14.

Previous conditions 6.2.9 and 6.2.10 stated the monthly and yearly reporting requirement for the VOC emission limit for Emission Units P3 and ST7. These conditions have been deleted since the emission units referenced are either no longer at the facility or no longer significant sources of VOC emissions.

Condition 6.2.11 gives the equation to be used to calculate VOC emissions when the press emissions are routed through the thermal oxidizers. This requirement was previously condition 6.2.15, which was modified in Amendment No. 2754-117-0025V-04-1 to include capture efficiency.

Conditions 6.2.12 and 6.2.13 state the required recordkeeping for Georgia Rule (mm) for the use of compliant inks, and for compliance alternative of time weighted averaging per line. These requirements were previously conditions 6.2.17 and 6.2.18.

Conditions 6.2.14 and 6.2.15 state the monthly and yearly reporting requirement for the VOC emission limit for Emission Unit P7. These requirements were previously conditions 6.2.23 and 6.2.24, which were added in Amendment No. 2754-117-0025V-04-4.

Previous condition 6.2.16 stating the requirements of Rule (vv) for the storage tanks has been deleted since this rule is no longer applicable.

Previous conditions 6.2.19 and 6.2.20 stating the requirements of Rule (ddd) for lithographic printing presses have been deleted since this rule is no longer applicable.

Previous conditions 6.2.21 and 6.2.22 stating the requirements of Rule (w) for rotogravure printing presses have been deleted since this rule is no longer applicable.

Previous condition 6.2.25, added in Amendment No. 2754-117-0025V-04-4, has been deleted since it required a one-time notification of startup of Press P7.

VII. Specific Requirements

- A. Operational Flexibility: not applicable
- B. Alternative Requirements: not applicable
- C. Insignificant Activities

Refer to <http://airpermit.dnr.state.ga.us/GATV/default.asp> for the Online Title V Application.

- D. Temporary Sources: not applicable
- E. Short-Term Activities: not applicable
- F. Compliance Schedule/Progress Reports: not applicable
- G. Emissions Trading: not applicable
- H. Acid Rain Requirements: not applicable
- I. Stratospheric Ozone Protection Requirements: not applicable
- J. Pollution Prevention: not applicable
- K. Specific Conditions: not applicable

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.